

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE AEGEAN MARINE
PETROLEUM NETWORK, INC.
SECURITIES LITIGATION

)
) Case No. 1:18-cv-04993 (NRB)
)
) Hon. Naomi Reice Buchwald
)
)
)
)
)

**NOTICE OF LEAD COUNSEL’S MOTION FOR
ATTORNEYS’ FEES AND REIMBURSEMENT OF LITIGATION EXPENSES**

PLEASE TAKE NOTICE that Lead Counsel¹ hereby moves this Court before the Honorable Naomi Reice Buchwald, for an order approving their application (1) for an aggregate award of attorneys’ fees of \$2,987,499.75 or 25% of the \$11,949,999 Gross Settlement Funds,² plus interest, and reimbursement of Litigation Expenses of \$78,308.88 to be paid out of the Gianniotis Settlement Fund and/or the Melissanidis Settlement Fund; and (2) for reimbursement of certain of Lead Plaintiffs’ reasonable costs and expenses in the amounts of \$5,000, pursuant to the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(a)(4).

Gianniotis and Melissanidis will not oppose this motion.

PLEASE TAKE FURTHER NOTICE that in support of the motion, Lead Counsel submits and is filing herewith:

- (A) Memorandum of Law in Support of Lead Counsel’s Motion For Attorneys’ Fees and Reimbursement of Litigation Expenses;
- (B) Declaration of Nicole Lavalée in Support of (A) Lead Plaintiff’s Motion For: (I) Final Approval of The Proposed Individual Defendants Settlements; (II) Final Certification of The Settlement Class; and (III) Final Approval of The Proposed

¹ All capitalized terms not otherwise defined herein have the same meaning as in the Notice of (I) Pendency of Class Action and Proposed Individual Defendants Settlements; and (II) Final Approval Hearing For The Individual Defendants Settlements, The Individual Defendants Plan of Allocation and Motion For Approval of Attorneys’ Fees and Reimbursement of Litigation Expenses (the “Detailed Notice”) (ECF No. 438-6).

² The “Gross Settlement Funds” refers to \$11,949,999 settlements, including the \$11 million settlement with Spyros Gianniotis (“Gianniotis”) (the “Gianniotis Settlement” or “Gianniotis Settlement Fund”) and the \$949,999 settlement with Dimitris Melissanidis (“Melissanidis”) (the “Melissanidis Settlement” or “Melissanidis Settlement Fund”).

Individual Defendants Plan of Allocation; and (B) Lead Counsel's Motion For Attorneys' Fees and Reimbursement of Litigation Expenses; and

(C) [Proposed] Order Awarding Attorneys' Fees and Reimbursement of Litigation Expenses.

Dated: September 14, 2023

Respectfully submitted,

BERMAN TABACCO

By: /s/ Nicole Lavallee
Nicole Lavallee (admitted *pro hac vice*)

Joseph J. Tabacco, Jr. (JT1994)
Christopher T. Heffelfinger (admitted *pro hac vice*)
Kristin Moody (admitted *pro hac vice*)
Jeffrey Rocha (admitted *pro hac vice*)
425 California Street, Suite 2300
San Francisco, CA 94104
Telephone: (415) 433-3200
Facsimile: (415) 433-6382
Email: jtabacco@bermantabacco.com
nlavallee@bermantabacco.com
cheffelfinger@bermantabacco.com
kmoody@bermantabacco.com
jrocha@bermantabacco.com

Counsel for Lead Plaintiff Utah Retirement Systems